



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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FILE:

REPLY TO THE ATTENTION OF:

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SEP 28 1999

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Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: Area 1, Phase II
Trap Range
Verification Report

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) verification of treatment report for the Area 1, Phase II Trap Range stabilization. The report documents the results of the stabilization of lead- and arsenic-contaminated soil at the trap range and firing range.

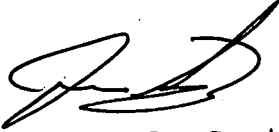
U.S. EPA found that the report is acceptable, and that the treated soil is not a hazardous waste and may be placed in the on-site disposal cell. However, there appears to be a discrepancy between U.S. DOE's and Severson Environmental Services' (SES) analytical results. U.S. DOE collected 16 split soil samples, extracted them using the toxicity characteristic leaching procedure (TCLP), and performed a total of 24 analyses on the extracts. In ten cases, SES results were higher than U.S. DOE results. In fact, for two samples collected from the firing range, SES's extract concentrations were more than five times those of U.S. DOE. The known heterogeneity of the soil in the trap range and firing range can produce major differences in split sampling results, but the consistency of the observed differences raises a concern that U.S. DOE results may be biased low. U.S. DOE should review its analytical procedures and use suitable performance evaluation samples to verify the accuracy of its analytical results. This verification should evaluate both the TCLP extraction procedure and the concentration determination procedure.

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Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,



James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

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